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Attorneys for Defendant YANG MING
(AMERICA) CORPORATION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DARRYL JACKSON,)	Civil Action No.: C07-06412
)	
Plaintiff,)	
)	STIPULATION AND PROPOSED
v.)	ORDER EXTENDING
)	DISCOVERY DEADLINES
YANG MING (AMERICA))	
CORPORATION, a corporation,)	Trial Date: April 13, 2009
)	
Defendant.)	

Pursuant to item 6 of the Court's Standing Order dated April 20, 2005, Plaintiff DARRYL JACKSON and Defendant YANG MING (AMERICA) CORPORATION, ("Yang Ming") hereby submit this Stipulation, requesting that:

1. the Non-Expert Discovery Cut-off date, currently set as October 31, 2008, be extended to December 5, 2008;
2. the Designation of Experts dates, currently set as November 21, 2008 and December 5, 2008 (designation and rebuttal designations) be extended to December 29, 2008 and January 5, 2009, respectively, and;
3. the Expert Discovery Cut-off, currently set for December 26, 2008, be extended to January 26, 2009.

Good cause exists for these extensions of time because, Yang Ming has had difficulty locating and subpoenaing several percipient longshoremen witnesses for their

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depositions, but believes that it will be able to secure this needed testimony by December 5, 2008. Good cause also exists for these extension because the parties are involved in two discovery disputes, which the Court has referred to Magistrate Larson, (set for hearing on November 12, 2008), with the parties' ability to conduct additional discovery and prepare expert witnesses for disclosure and deposition being dependent upon the resolution of those motions.

The parties do not anticipate that providing this additional time for discovery will result in a delay of the April 13, 2009 trial date.

Respectfully submitted.

Dated: October 23, 2008

BOXER & GERSON, LLP,
Attorneys for Plaintiff DARRYL JACKSON

By: /s/ Gary B. Roth
Gary B. Roth

Dated: October 23, 2008

COX, WOOTTON, GRIFFIN, HANSEN &
POULOS LLP, Attorneys for Defendant
YANG MING (AMERICAN)
CORPORATION

By: /s/ Mitchell S. Griffin
Mitchell S. Griffin

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ORDER

Good cause appearing, and pursuant to the above stipulation, the Court hereby continues the following dates:

1. Non-Expert Discovery Cut-off, currently set as October 31, 2008, is reset to December 5, 2008;
2. Designation of Experts, currently set as November 21, 2008 and December 5, 2008 (designation and rebuttal designation) is reset to December 29, 2008 and January 5, 2009, respectively, and;
3. Expert Discovery Cut-off, currently set for December 26, 2008, is reset to January 26, 2009.

All other dates contained in the Court's Pretrial Preparation Order, dated April 7, 2008, are unchanged.

SO ORDERED.

Dated: October 27, 2008


United States District Court Judge

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